



Guidance on Repainting Existing Water Storage Tanks

September 30, 1997

Introduction

The State Primary Drinking Water Regulations (SPDWR), Section R.61-58.7(E)(14) require written notification to the Department of Health and Environmental Control (DHEC) at least 10 days prior to the repainting the interior or exterior of any water storage tank (elevated and ground storage tanks, standpipes and hydropneumatic storage tanks). The purpose of this notification is to provide DHEC the opportunity to offer technical assistance and to be aware of the activity in the event of complaints from the public.

Notification Process

At least ten (10) days prior to initiating the repainting of a water storage tank, the public water system must submit written notice sent to the local Environmental Quality Control (EQC) District Office. A list of the EQC District Offices and the counties they serve is attached.

The written notification must include:

1. a map or other detailed description of the water storage tank location; and,
2. a date on which work is expected to begin and a date when the tank is expected to be returned to service.

Other Regulatory Requirements

There is no requirement that a public water system obtain a permit or any other type of approval from DHEC prior to repainting a storage tank. However, there are several regulatory requirements that a public water system must keep in mind when preparing to repaint a storage tank. Some of the requirements are as follows.

1. Coatings used on the interior of a water storage tank must be certified by a third party as meeting specifications of the American National Standards Institute / National Sanitation Foundation (ANSI/NSF) Standard 61, Drinking Water Components - Health Effects as per the SPDWR's. The certifying party must be accredited by the American National Standards Institute. Hot and cold applied waxes, grease and coal tar coatings are not allowable, except where these are the only coatings that have ever been used on the tank and the coating to be installed has been certified by a third party as meeting the specifications of ANSI/NSF Standard 61. DHEC strongly recommends that water

systems consider another coating system for tanks which have only used hot or cold applied waxes, grease or coal tar coatings.

2. Unless there is information available indicating that the existing paint to be removed from the tank contains no hazardous constituents, all paint waste must be assumed to be hazardous waste. The waste must be collected and contained until a laboratory analysis has been completed to determine if hazardous waste has been produced. If the existing paint coating determined to be nonhazardous, collection is not required. Potential damages to adjacent property should be considered if sandblast residue migrates across property lines. DHEC's Bureau of Land and Waste Management, Waste Assessment Section, telephone (803) 896-4000 or the EQC District Hazardous Waste staff can offer guidance on testing the paint to determine if it is hazardous and disposal options for both hazardous and nonhazardous waste.
3. A minimum pressure of twenty-five (25) pounds per square inch (psi) of pressure must be maintained in the distribution under normal system demand. However, a minimum pressure of twenty (20) psi is allowed during periods of unusually heavy flows (i.e., fire or flushing) [Section R.61-58.7(E)(7)]. The public water system must take necessary steps to insure that these minimum pressures are maintained when a tank is removed from service. Local fire departments should be notified whenever a storage tank is removed from service that may affect their ability to fight fires.
4. The public water system must comply with the maximum contaminant levels specified in the SPDWR. In order to help insure that these standards are complied with, interior coatings must be allowed time to cure in accordance with the manufacture's recommendations. Also, the tank should be disinfected in accordance with the latest American Water Works Association standards prior to placing the tank back into service. If the water tank is not taken out of service during exterior painting, openings and vents of atmospheric storage tanks must be sealed to prevent contamination of the water supply.

EQC DISTRICT OFFICES

APPALACHIA I (0496)

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Liz Maxwell, Adm. Support
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UPPER SAVANNAH (0492)

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Nancy Manning, Adm. Support
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*Phone: 223-0333 Fax: 223-6935
(Greenwood, Abbeville, Laurens, Saluda, Edgefield, McCormick)

WACCAMAW (0491)

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WATEREE (0493)

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(Sumter, Kershaw, Lee, Clarendon)

* Phone - The area code for these districts is 864 (instead of 803)

** Mailing address - CATAWBA - PO Box 100, Fort Lawn, SC 29714

WATEREE - PO Box 1628, Sumter. SC 29151

APPALACHIA III- P.O. Box 8778, Spartanburg, SC 29305